

Serguel M. Akiti, Esq.  
D.C. Bar # 1631134  
sakiti@lowtherwalker.com

Lowther | Walker LLC  
101 Marietta St. NW, Ste. 3650  
Atlanta, GA 30303  
404.496.4052

Attorney for Defendant  
Gerald Dickerson

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GERALD DICKERSON, AND  
AMY WILLIAMS,  
  
Defendant.

No. 1:21-CR-00224-NODJ-BAM

**STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS UNDER  
SPEEDY TRIAL ACT; FINDINGS AND  
ORDER**

Date: November 13, 2024  
Time: 1:00 PM  
Court: Hon. Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 13, 2024.
2. By this stipulation, defendants now move to continue the status conference until February 26, 2024, and to exclude time between November 13, 2024, and February 26, 2024, under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files all of the discovery has been either

1 produced directly to counsel and/or made available for inspection and copying.

2 b) The government has provided plea agreements to defendants.

3 c) Counsel for defendants desire additional time to further review discovery,  
4 discuss potential resolution with their clients and the government, and investigate and  
5 prepare for trial.

6 d) Counsel for defendants believe that failure to grant the above-requested  
7 continuance would deny him/her the reasonable time necessary for effective preparation,  
8 taking into account the exercise of due diligence.

9 e) The parties will be prepared to set the matter for jury trial if there have  
10 been no resolutions to this matter by the next status date.

11 f) The government does not object to the continuance.

12 g) Based on the above-stated findings, the ends of justice served by  
13 continuing the case as requested outweigh the interest of the public and the defendant in a  
14 trial within the original date prescribed by the Speedy Trial Act.

15 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
16 3161, et seq., within which trial must commence, the time period of November 13, 2023  
17 to February 26, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
18 3161(h)(7)(A), (B)(iv) [Local Code T4] because it results from a continuance granted by  
19 the Court at defendants' request on the basis of the Court's findings that the ends of  
20 justice served by taking such action outweigh the best interest of the public and the  
21 defendants in a speedy trial.

22 i) The parties also agree that this continuance is necessary for several  
23 reasons, including but not limited to, the need to permit time for the parties to exchange  
24 supplemental discovery, engage in plea negotiations, and for the defense to continue its  
25 investigation and preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i)  
26 and (iv).

27 4. Nothing in this stipulation shall preclude a finding that other provisions of the  
28 Speedy Trial Act dictate that additional time periods are excludable from a period within which a

trial must commence.

IT IS SO STIPULATED.

Dated: November 6, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ STEPHANIE M. STOKMAN  
STEPHANIE M. STOKMAN  
Assistant United States Attorney

Dated: November 6, 2024

/s/ SERGUEL M. AKITI  
SERGUEL M. AKITI  
Counsel for Defendant  
GERALD DICKERSON

Dated: November 6, 2024

/s/ REED GRANTHAM  
REED GRANTHAM  
Counsel for Defendant  
AMY WILLIAMS

**ORDER**

IT IS SO ORDERED that the status conference is continued from November 13, 2024, to **February 26, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv). **However, in any request for a continuance, the parties shall explain when they will be ready to set a trial date.**

IT IS SO ORDERED.

Dated: November 8, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE